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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane • PO Box 47775 • Olympia, Washington 98504-7775 • (206) 753-2353

November 23, 1993

Daniel L. Goodell
Jones-Goodell Corp.
1690 Marine View Drive
Tacoma, WA 98422-4103

Dear Mr. Goodell:

Re: General NPDES Permit No. WAG-03-1019, Class I Compliance Inspection, Jones-Goodell Corp.

On October 28, 1993, Joyce Mercuri and I conducted the above-referenced inspection to determine compliance with General NPDES permit requirements. A copy of our inspection report is enclosed for your information. Eight of the nine conclusions noted in the inspection report need your immediate attention.

I will be conducting a follow-up inspection within 60 days to ensure housekeeping practices have improved, and the Spill Control Plan and Solid Waste Disposal Plan are being implemented.

I would like to thank Harold Hahn for his time that was spent in completing this inspection. If at any time you have a question regarding the permit, inspection reports, or discharge, or if there is a significant change in the discharge or operation, please contact me in Olympia at (206) 586-6240.

Sincerely,

Sandra Stephens
Compliance Inspector
Urban Bay Action Team
Toxics Cleanup Program
Southwest Regional Office

SS:dc
Enclosure

cc: Troy Naccarato, Tacoma Sewer Utility
✓ Karen Keeley, EPA
Gary Lee, Ecology
Dave Knight, Ecology
Dave Smith, Ecology



PAC HH JONG31R112393





United States Environmental Protection Agency
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Facility Type				
1 <u>N</u>	2 <u>S</u>	3 <u>W</u> <u>A</u> <u>G</u> <u>0</u> <u>3</u> <u>1</u> <u>0</u> <u>1</u> <u>9</u>	11	12 <u>9</u> <u>3</u> <u>1</u> <u>0</u> <u>2</u> <u>8</u>	17	18 <u>C</u>	19 <u>S</u>	20 <u>2</u>	
Remarks									
21									
66									
Reserved Facility Evaluation Rating BI QA -----Reserved-----									
67		69	70	71	72	73	74	75	80

Section B: Facility Data

Name and Location of Facility Inspected JONES-GOODSELL CORP 1690 MARINE VIEW DRIVE TACOMA WA 98422-4103	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 0930	Permit Effective Date
	Exit Time/Date 1030 10/28/93	Permit Expiration Date 11/04/97
Name(s) of On-Site Representative(s) HAROLD HAHN	Title(s) SUPERINTENDENT	Phone No(s) (206) 272-1212
Name, Address of Responsible Official DANIEL L. GOODSELL	Title GENERAL MANAGER	
	Phone No. (206) 272-1212	Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N/A	Flow Measurement	U3	Pretreatment	U4	Operations & Maintenance
M1	Records/Reports	N/A	Laboratory	N	Compliance Schedules	N/A	Sludge Disposal
M2	Facility Site Review	N	Effluent/Receiving Waters	N	Self-Monitoring Program	U5	Other: stormwater

Section D: Summary Of Findings/Comments (Attach additional sheets if necessary)

1. This is the Permittee's first term of the permit. Permittee was not familiar with the requirements to develop and implement a Spill Control Plan and Solid Waste Disposal Plan. Ecology agreed to send a copy of the general Spill Control Plan and Waste Disposal Plan. Ecology will conduct a follow-up inspection within 60 days to ensure plans are being implemented and housekeeping practices have been improved.
2. The facility has reduced its workforce from 60 to about 13 employees. Currently the yard is doing repair work and not new boat construction. Repair work appears to increase yard cleaning activities. Yard has received little attention due to reduction in workforce. Therefore, housecleaning practices were poor, for specifics see the attached inspection report.
3. The Permittee has not received authorization to discharge to the City of Tacoma's sanitary sewer. The Permittee is working with the Tacoma Sewer Utility to receive authorization to discharge, however, the oil/water separator cannot attain effluent limits for pressure wash water. Therefore, Permittee shall be required to submit an engineering report.
4. The oil/water separator was empty. Proper operation of this system requires the chambers to be filled with water prior to use.
5. Paved yard between marine railway and building is sloped and paved such that stormwater runoff is directed into oil/water separator which is intended to provide treatment for pressure wash water. The City of Tacoma is under a compliance schedule to develop a plan to address infiltration/inflow (I/I) problems and eliminate raw sewage bypasses during major storm events. Therefore, the City may want to consider having the Permittee redirect runoff away from the oil/water separator.

☐ Announced
☒ Unannounced

Name(s) and Signature(s) of Inspector(s) Sandra Stephens	Agency/Office/Telephone Ecology/SWRO/UBAT/(206)586-6240	Date 11/22/93
Joyce Mercuri	Ecology/SWRO/UBAT/(206)586-4692	11/22/93
Signature of Reviewer Dave Smith	Agency/Office Ecology/SWRO/UBAT/(206)586-2775	Date

Regulatory Office Use Only

Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance
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INSPECTION REPORT

Date of Visit: October 28, 1993

Inspectors: Troy Naccarato, Tacoma Sewer Utility
Joyce Mercuri, Ecology
Sandra Stephens, Ecology

Name of Entity: Jones-Goodell Corporation

Persons Contacted: Harold Hahn, Superintendent

Permit Number: General Boatyard NPDES Permit No. WAG-03-1019

Permit Expires: November 4, 1997

City: Tacoma

County: Pierce

Type of Facility: Boatyard

Receiving Water: Hylebos Waterway
Inner Commencement Bay

Type of Treatment System: Stormwater - Best Management Practices (BMPs) are to be implemented by 5/26/94.

Pressure Washing - discharge to sanitary

COMMENTS

This was an unannounced NPDES Permit Class I Compliance Inspection conducted by Joyce Mercuri and Sandra Stephens from the Southwest Regional Office, Toxics Cleanup Program, Urban Bay Action Team (UBAT). Troy Naccarato, from the City of Tacoma's Utility Services Technical Support accompanied us on the inspection.

We arrived at the facility at approximately 9:30 a.m., on October 28, 1993, and left at 10:30 a.m. The weather was overcast. We met with Harold Hahn, Superintendent for Jones-Goodell Corporation. We reviewed some of the permit paperwork and toured the yard. Mr. Hahn provided the tour and information.

In the office we reviewed NPDES General Boatyard requirements for the Jones-Goodell facility. Each facility issued a boatyard permit must develop and implement a spill control plan and a solid waste disposal plan within six (6) months of the permit issuance date. These plans are to be kept on site and available for Ecology's review during an inspection. Jones-Goodell plans were to be fully implemented by November 26, 1993. Mr. Hahn was not familiar with the required plans. There was some question if the City's required Accidental Spill Prevention Program (ASPP) plan would meet

NPDES permit requirements. Mr. Hahn could not locate a copy of the ASPP plan. Mr. Hahn requested additional assistance from Ecology and asked to see a copy of the general Spill Control Plan and Waste Disposal Plan developed by the Northwest Marine Trade Association that meets permit requirements. I agreed to send the information to him.

The site is comprised of approximately 2.4 acres and includes one marine railway, one crane, two covered ways, and a dock. The building on site which includes the two covered ways, also houses the offices, paint room, fiberglass room, and woodworking area. The crane is not used for removing boats from the water. A system of rails are in place to move vessels to and from marine railway to ways. At the time of the inspection there were two vessels that were hauled out and being worked on. At way No. 1 the yacht, Eagle III (125 feet, 153 tons), was having major interior and exterior work done. The length of the yacht was not completely covered by the way. The uncovered section of the yacht was tented with temporary scaffolding that was draped in plastic. The Mother Goose was hauled out on the marine railway for exterior hull work. There were approximately 6 boats moored at the dock that were having light maintenance work done.

The marine railway is located adjacent to the Hylebos Waterway. Pressure washing is only conducted in the marine railway. The railway has a cement containment floor which drains to a shallow trough which directs water to a catch basin where it is pumped to an oil/water separator that was approved by Ecology on June 3, 1991. Effluent from the oil/water separator is discharged to the sanitary sewer. When Ecology approved the oil/water separator the General NPDES Boatyard permit had not been issued (1992). Special Condition S2 of the NPDES permit contains effluent limits for bottom wash water that is discharged to a municipal sanitary sewer. The level of contaminants allowed in wastewater by the general permit for discharge to the sanitary sewer cannot be attained by an oil/water separator. Therefore, Jones Goodell must submit an engineering report for collection and treatment of pressure wash wastewater.

At the time of the inspection Jones-Goodell had not received authorization to discharge to the City of Tacoma's Central Treatment Plant. Troy Naccarato from Tacoma Sewer Utility had scheduled a sampling event for today, however, there was insufficient effluent to sample for analysis because the system had been cleaned. Troy explained sample collection requirements to Mr. Hahn. Mr. Hahn agreed to call Troy for a sampling event following the pressure washing of three boats. The results of the analysis will be used to determine if the effluent will meet the local discharge limitations.

There was a temporary pipe line coming from the Eagle III that discharged into the final sump pump area prior to being discharged to the sanitary sewer. Mr. Hahn indicated the line was for grey water.

The yard between the marine railway and building is sloped and paved such that stormwater runoff is directed into the treatment system. The engineering report that was approved by Ecology on June 3, 1991, indicates .08 acres¹ of stormwater would be directed to the oil/water separator. The area that is being directed to the system appears to be greater than what the system was designed for. Also, the City of Tacoma's wastewater treatment plant No. 1 (Central) collection system is hydraulically overloaded during major storm events which results in collection system overflows (raw sewage

¹30 by 100 feet, which is the approximate size of the wash pad.

bypasses). The City of Tacoma is under a compliance schedule to develop a plan to address infiltration/inflow problems and eliminate raw sewage bypasses. Therefore, the City of Tacoma may want to consider having Jones Goodell redirect runoff away from the treatment system.

There are two catch basins on the site. The upstream catch basin is located in the parking lot. The second is located in the building and was not accessible for inspection. The 1990 engineering report prepared by Applied Geotechnology, Inc., indicates that the catch basin's storm line discharges below the marine railway ramp. This discharge point was not evaluated as part of this inspection. However, there is a question as to whether this discharge point really exists. The site map that was submitted with the general boatyard application indicates the storm line discharges to the catchment area located in the gravel yard. The gravel yard appears to be poorly drained; puddles and muddy areas were visible.

At the rear of the building, on the west side of the property, is an open shed draped with plastic. This shed was used as the blasting shed. However, it is currently being used as a paint booth until the ventilation system in the paint room is repaired. There was spent grit on the ground in front of the shed.

Cured paints, resins, and gelcoat are poured into recycled cans and allowed to dry. Can bottoms are cut out, and the hardened wastes disposed of as a hazardous waste. Located towards the center of the property in the gravel yard is a small wood frame structure that is used to store these cans of cured paints, resins, and gelcoat. However, there were approximately 10 cans on top of the structure; all of them contained rain water (Photos No. 1 and 2).

Located on land just prior to dock was a pallet of used batteries that the plastic tarp had blown off.

On the dock there was a small container which contained a paint brush and what looked like left over paint and storm water. The container was open to the weather and was not placed on a drip pan. Empty caulking tubes were also present.

Fuel was being stored in drums undercover in the floating boat house. A boat repair made the removal necessary. When repair is completed the boat will be refueled from drums.

Jones-Goodell has not received any new orders for boats this past year. As a result, the company has reduced its work force from approximately 60 employees to about 13 employees. Mr. Hahn indicated that the reduction in forces has resulted in poor housekeeping practices.

RECOMMENDATIONS AND CONCLUSIONS

1. Jones-Goodell shall develop and implement their Spill Control Plan and Solid Waste Disposal Plan as required by Special Conditions S4 and S5.

Enclosed for your use is a copy of the general plans developed by the Marine Trade Association. These plans should be placed in a binder along with your permit and formatted to accommodate revisions. This binder shall be available for Ecology's review during an inspection.

Employees shall be informed about these plans and be expected to perform in accordance with these practices. Copies of these plans, including emergency phone numbers, shall be posted in the work areas.

2. Jones-Goodell shall submit an engineering report for collection and treatment of pressure wash wastewater within 3 months.

Ecology will accept the METRO "BOATYARD WASTEWATER TREATMENT GUIDELINES" as a general engineering report that will satisfy the requirements of the permit. However, if Jones-Goodell chooses to adopt the approved general engineering report prepared by METRO, a letter stating their intent shall be submitted to Ecology within 30 days. The letter shall clearly indicate the type of treatment system to be adopted from METRO's report, the proposed wastewater discharge point, and a statement stating that effluent from the proposed treatment system will meet the applicable permit limitations.

Jones-Goodell shall submit plans and specifications for wastewater treatment system based on the approved engineering report within 60 days. If Jones-Goodell chooses to develop a facility specific engineering report they may not be able to meet the May 26, 1993, submittal date for plans and specifications identified in their NPDES permit.

Start of construction is to commence 90 days after approval of plans and specifications. Construction shall be completed approximately 90 days after start of construction.

3. Jones-Goodell shall continue to work with the Tacoma Sewer Utility to receive authorization to discharge effluent from their oil/water separator to the sanitary sewer. However, all wastewater that is discharged to the sanitary sewer must meet local discharge limitations. An oil/water separator cannot attain the effluent limits. Therefore, Jones-Goodell must submit an engineering report for pressure wash treatment system as outlined in Number 2 above.

In addition, the City of Tacoma may want to consider having Jones Goodell redirect runoff away from the oil/water separator. This could be done by installing curbs.

4. Subsequent inspections by Ecology should investigate the location of the storm line outfall location.
5. Grit blast media, spent or new, leaches metals when it comes in contact with water. Therefore, blasting abrasive in the gravel yard shall be swept or shoveled up and disposed of properly.

Any future blasting abrasive in the yard should be swept up at the end of each day, placed in a covered area that prevents direct contact with precipitation, and disposed of in a timely manner.

6. Paint, resins, and gelcoat drying containers must be covered to prevent direct contact with precipitation. The storm water collected in the drying containers must be disposed of as a hazardous waste.

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7. Batteries should be stored under cover until properly disposed of. When temporarily storing batteries outside the bottom edge of plastic sheeting shall be weighted to remain in place during a light breeze.
8. When painting from open floats, paint cans shall be kept in drip pans with drop cloths or tarps underneath the drip pans. When the job is completed remove from open floats immediately.
9. The loading, unloading, and storage of small quantities of petroleum products from or to marine vessels must comply with Uniform Fire Code Requirements. If Jones-Goodell has any questions regarding the requirements for storing petroleum products in a floating boat house, they should contact the City of Tacoma's Fire Marshall.

SS:dc